

DANA H. FOX, PRO-SC
J.
MOTORS LIQUIDATORS
FOR
GENERAL MOTORS, INC.

)
CASE 09 B 50026 (REG)
CLAIM 4287?
EFP #12443

) ATT. JUDGE GERBER
MOTION FOR ORDERLY
DISTRIBUTION

MR. FOX RECEIVED AN INITIAL DISTRIBUTION ON 1/10/14 FROM WILMINGTON TRUST TO FIDELITY; NEITHER ENTITIES ACKNOWLEDGED THE TRANSFER AND DEPOSIT UNTIL 1/21/14. THE MARKET VALUE OF THE STOCKS & WARRANT FELL FROM \$40.- PER SHARE TO \$38.- PER SHARE BEFORE MR. FOX WAS ABLE TO TRANSFER THE FUNDS TO A SECURE CASH ACCOUNT. THE FINAL MARKET VALUE AS OF 1/21/14 WAS DOWNSIZED DOWN TO \$7344.36 @ 38.- per share plus WARRANTS VALUE.

MR. FOX PLEASE MOTIONS THAT ANY LOSSES DUE TO CLERICAL NEGLIGENCE, BREACH OF FIDUCIARY TRUST AND MARKET FLUCTUATION BE REFLECTED IN A FINAL SETTLEMENT PAYMENT TO COVER THE FULL \$19,500.- FOR WILMINGTON TRUST WHICH AN ASSISTANT SAW DISTRIBUTION'S KNOWS WHEN THAT WILL BE. FIDELITY WILL ONLY TRANSFER STOCKS TO A CASH ACCOUNT WHEN MR. FOX CALLS [NO PRIOR REQUEST(S) TAKEN TO SECURE ACTUAL, LIQUIDATED VALUE]. THIS IS MOTIONED FOR WITHIN THE CURRENT SETTLEMENT ORDER SO ADDITIONAL LITIGATION (AND EXPENSE) WILL BE AVOIDED.

I CERTIFY A TRUE COPY IS FORWARDED AND SERVED BY U.S. MAIL TO JOSEPH SMOLINSKY FOR MOTORS LIQUIDATORS, ET AL. ON THIS DATE -

JAN 27 2014

[With her signature]

RESPECTFULLY SUBMITTED

Dana H. Fox PRO-SC
DANA H. FOX "

